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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA
2:12-cv-02040-JAD-PAL

MARC J. RANDAZZA,

v.

Crystal L. Cox

**Defendant's Answer To
Order to Show Cause**

Pro Se Defendant Crystal Cox received this motion Granting Plaintiff's motion to show cause, however Cox did not receive the motion to show cause or Cox would have filed an objection. Cox does not have electronic access and Randazza refuses to email documents to Defendant Cox.

Cox has the same mailing address since the beginning of this case, however, at one point, Cox lost her PO Box as Cox has no money, and had no way to pay for the PO Box for 2 months. Cox always had email access however the court does not send Cox emails recording motions filed. This order to show cause, and the order granting counterclaim was emailed to Cox. But only the order not the full motion showing that Cox was to show cause, I just got that.

Cox has filed a counterclaim, as court ordered, the court has received the claim, but Cox has no word on if the motion was filed. Cox just got this Order today, it is Feb. 27th and has until tomm. to file a response, without electronic access there is NO WAY for Cox to defend herself. I have no money, cannot get to my PO Box often, and am doing the best I can under this extreme, unconstitutional duress put on me constantly by my former attorney Marc Randazza.

I have no way to know if the court got this document as yes, I track the document, but I have had motions not be entered and I get no email telling me, and I cannot afford Pacer, so I am left doing the best I can against powerful, wealthy, mafia connected thug attorneys.

Randazza is the one that should be in contempt. He should be in Prison, he is involved with organized crime, threatens my sources, is a bully and a thug and the courts let him do what he wants to who he wants, meanwhile his victims pile up.

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There is no reason to respond to Randazza's motions, I am not an attorney, I cannot afford an attorney, this court will not give me an attorney. I cannot defend myself and all my pleadings get stricken and thrown out, so why bother responding.

Out of respect for the court I am trying my best to respond to this as it is court ordered but I need counsel, I am a creative writer and ya, I tend to ramble and repeat, its who I am.

I am NOT an attorney. I am on the RIGHT SIDE OF THE LAW and the right side of the moral compass. I am trying to protect victims of human trafficking and the porn industry. I cannot fight Randazza anymore, I don't have the money, the strength, the knowledge. If the court cannot or will not provide me an attorney then so be it, I cannot write legal ease and file documents to defend myself, I have tried to no avail.

Pro Se Defendant Crystal Cox is an investigative blogger reporting on Marc Randazza and his connections to organized crime in the porn industry. Cox has suffered extreme prejudice, hatred, gang stalking, and threats from Randazza and those connected to Randazza.

Cox has never targeted a child in anyway and has a First Amendment right to speak critical of Mr. and Mrs. Randazza.

Plaintiff Randazza has committed fraud on this court and perjury in stating that Cox offered to clean up his reputation for a fee, flat out, unproven lies, taken by this court as fact. I have fought back to the best of my ability and LOST. What more can I lose?

Plaintiff wants to SANCTON Cox, however the only sanction available really is the death sentence, as Cox has no home, no money, no quality of life left and nothing to lose.

I cannot imagine one judicial sanction that would change my life for the worse.

Cox is willing to die for this Cause of exposing the Evils of Porn and human trafficking. If Cox is sanctioned, what could that possibly be, Cox has nothing to lose. And if the sanction is jail time, well Cox has no home, or money for food so Cox does not fear this either.

Pro Se Defendant Crystal Cox means no disrespect to this court and in fact hoped that this new judge would actually see who Randazza is and want to clean up this mess, and call out those involved in human trafficking. I have sincerely done the best I could to defend myself, learned as much as could on procedure, done the best I could, I cannot do anything else to defend myself, if the law is that gets me a \$3million dollar judgement, so be it, nothing I can do. I have no way to fight back.

As for the allegation of not answering the complaint correctly, well again, I am just one woman, doing the best I can, sued by a powerful thug porn attorney who was my attorney. I was forced to

answer and not address conspiracy, I have no idea how to do a better job, clueless. Sorry.

As for the allegation of this case have a tortured procedural history, yes it would have been cheaper for the court to appoint me an attorney as is my civil and lawful right. I have done the best I can at procedure. I move this court to start over, give me, Cox, an attorney or simply rule against me because I do not know legal jargon, nothing I can do but take it, my life is in your hands, and there is nothing I can do better than I have to fight back, to defend myself. I am at the mercy of the court and so is the life and quality of life of the victims I give voice to as an investigative blogger, do what you must as a matter of LAW and Constitutional Rights.

On January 27th 2014, Randazza Legal Group (RLG) issued a subpoena to Godaddy, the Notice of Subpoena was District of Nevada, and signed by "Law Clerk" at RLG, signature cannot be made out, and no printed name. The actual subpoena to Godaddy said "District of Arizona" on the documents, and stated that a C. DeRose at 5131 N. 40th St, A310, Phoenix AZ would examine all financial data, electronically stored information, billing data, IP data, server data, all phone numbers, and contact of anyone associated with accounts or to the specified people that Randazza wanted personal, financial and intellectual property information on; to be examined on Feb. 7th, 2014. The Exhibit to this subpoena was a District of Nevada document stating further persona, private, and financial data that RLG was commanding that Godaddy turn over to them in regard to Crystal Cox.

This Subpoena gave RLG access to the private and financial information of porn industry insiders, whistleblowers such as Monica Foster and Diana Grandmason, both exposing RLG and their connections to Organized Crime in the Porn Industry, prostitution forced on porn actors, pedophiles connected to RLG and the activities of the Free Speech Coalition and RLG to move the porn industry to Las Vegas.

This Subpoena also gave RLG access to the private data and financial information of iViewit inventor Eliot Bernstein, of which is an inventor Cox has been reporting on for over 4 years.

Over a Decade ago iViewit Technology invented a video coding technology that changed pixelated video to clear crisp video. Counter defendant Randazza's clients make billions a year off of this technology, in which they infringe on.

On January 27th 2014, Randazza Legal Group (RLG) issued a District of Nevada subpoena to Verizon Wireless, the actual Subpoena is District of Northern Texas, this subpoena commands Verizon, though Klemchuk Kubasta LLP 8150 N. Central Expressway, 10th Floor Dallas, TX to be allowed to inspect documents requested on February 10th, 2014.

The Exhibit to the subpoena, a District of Nevada document COMMANDING that Verizon give Counter Defendant Randazza, Cox's personal private information, phone numbers, personal calls, business calls, billing and payment information, data that breaches the privacy of

countless individuals and companies, lawyers, media, clients, customer, and friends of Cox.

This subpoena also gave Randazza access to phone numbers and data of sources whom had told Cox of issues of organized crime, prostitution and more in which Cox was reporting on connected to RLG, the Free Speech Coalition and the Organized Crime in Porn. Including delicate and private information, texts, phone numbers, contacts of those who have been threatened by RLG and connections. The Subpoena also requested all other numbers on the account thereby unjustly data mining Cox's family, friend, business partners, and personal relationships.

The Subpoena also allowed RLG to access who may help Cox pay her bills, or help her to have a phone. As Cox has no money, no home and is penniless due to the relentless actions of Randazza. This compromises the private information of those helping Cox to have a lifeline, a phone. This could also give RLG access to where Cox is located at all times and as Counter Plaintiff Cox has stated many times in this case, Cox's life is in danger, under constant duress and threats by those in the porn industry connected to Randazza and this is potentially life or death to Cox and her sources.

Cox claims Randazza issued a false instrument, impersonated a Subpoena and has caused Cox and those connected to her irreparable harm.

On Feb. 2, 2014 Randazza filed an Amicus Brief in the Ninth Circuit Court of appeals to attempt to convince the Ninth Circuit panel in a civil trial defamation case, (Obsidian v. Cox) that Counter Plaintiff Cox is a criminal.

Randazza flat out lied stating "Cox is an Extortionist" in sworn documents to the Ninth Circuit.

Randazza states that Cox extorted him, yet Randazza never filed a criminal complaint in a proper jurisdiction and venue, instead, abusing his power and privilege as an attorney Randazza uses civil courts, WIPO, and mass media to frame Cox, paint Cox in false light, and make Cox look guilty of the crime of extortion without allowing Cox due process of law within the Criminal Justice System, or Cox having a Criminal attorney appointed to her.

In this 9th Circuit Amicus Randazza used his ruling, via his own words, in this court (District of Nevada, Randazza v. Cox and Bernstein) regarding an unconstitutional TRO, and his words in a WIPO complaint both against Cox and Eliot Bernstein, stating this was evidence that Cox had been adjudicated and found guilty of the crime of extortion.

Cox has never been on trial for extortion, under investigation for extortion, adjudicated for extortion or convicted of extortion.

Randazza also used as his alleged evidence in his Ninth Circuit amicus stating Cox is an

Extortionist, a MT real estate board hearing proposal regarding a complaint against Cox regarding MT agency law (real estate representation laws) and having nothing to do with extortion. The proposal was dated July 5th 2013, and was a preliminary hearing document.

On February 13th RLG Admitted to Cox the following:

Feb 13 at 6:23 PM

Upon further review of the subpoenas issued to GoDaddy, we realize that they were not properly issued. Pursuant to December 2013 changes to the Federal Rules of Civil Procedure, the subpoenas should have been issued from the United States District Court for the District of Nevada and not the District of Arizona. (See Fed. R. Civ. P. 45(a)(2).) Accordingly, we withdraw the subpoenas.

Ronald D. Green, Jr.

Randazza Legal Group

Thereby admitting that Randazza Legal Group, licensed in Arizona as well as Nevada, and having Superior Knowledge of the Law, had used a false instrument, a forged document per say that was not properly issued in order to gain private information of Cox, Monica Foster, Diana Grandmason, Eliot Bernstein and other contacts, friends, clients and business associates of Counter Plaintiff Cox.

On Feb. 13th, 2014 Randazza is in communication with Stephen Lamont, a man who is involved in the iViewit Technology patent thefts, Stephen Lamont has previously threatened Cox that she had better get her affairs in order while she still can. And is involved in ongoing FBI, DOJ, USPTO and SEC investigations regarding the stolen iViewit Technology. As well as named in federal RICO and Racketeering cases regarding the iViewit Technology and inventor Eliot Bernstein.

It appears that Randazza has been in communication with Lamont since Feb. 23rd of 2013.

Randazza clearly attempted to get Lamont to claim that Cox extorted him, asked for money from him. Randazza offers to represent Lamont for FREE if he will go after Cox in a cybersquatting lawsuit.

Lamont admits to helping Randazza to bankruptcy Eliot Bernstein.

Lamont has no acting authority in iViewit, yet continues to act against iViewit shareholders. Randazza is conspiring with Lamont to retaliate and harass Counter Plaintiff Cox and Eliot Bernstein.

In Randazza's communications with Lamont he digs into private family matters, trusts, iViewit technology financial information, and the private life and businesses of Eliot Bernstein.

All of which are under investigation with the Palm Beach County Sheriff's Office, under the Financial Crimes Unit, Special Investigations Division, Detective Ryan Miller, for fraud, forgery and possible murder in the Simon Bernstein and Shirley Bernstein Estate case which involves shares of iViewit.

On February 26th, 2014 Marc Randazza conspired with Porn Attorney Allan B. Gelbard, of whom are connected to the Free Speech Coalition, known pediophiles, human trafficking, prostitution rings whereby porn stars are hookers, gang stalking, threats to porn whistle blowers and organized crime in the porn industry to file an Amicus Brief in the Ninth Circuit for Martin Cain of Dylan energy, pleading that the Ninth Circuit RULE that Crystal Cox is GUILTY of Extortion, a felony crime of which Cox has not been under investigation for, been on trial for or been adjudicated for. Randazza did this with massive conflicts of interest and motive, in extreme retaliation of Cox for exposing his criminal and unethical activities.

Answer to the Show Cause Questions, to the Best of My Ability

1.) This court shut down my blogs, took my search engine ranking, allowed Plaintiff to redirect all my blogs, blog posts and websites to one post on Randazza's blog defaming me, slandering me, Cox and promoting hate and lies about Cox. This was done long ago, seemingly case closed.

Defendant Cox does not understand what Cox has done in alleged contempt. Randazza took all blogs related to this case and has abused the court process to steal Cox's internet marketing, web ranking and blogs.

Randazza has lied to this court and taken blogs in which he had no right to take. Cox has a legal, first amendment right to post online about Marc Randazza, her former attorney. Randazza has no right to shut down Cox's blogs that speak critical of him. But this court allowed Randazza to take Cox's sites and use them to post hate about Cox. This is a violation of Cox's constitutional rights. The TRO did this. Cox is confused on how she is violating a "Temporary" TRO when it has been 16 months and Randazza already WON this case.

Randazza took the sites, the names, through an unconstitutional TRO, with no First Amendment Adjudication, they can NEVER be restored in the search engines, never be recovered. Cox has no money so a 3 Million dollar judgement will not do Randazza any good.

Randazza continues to taunt and attack Cox to try and scare her into STOPPING reporting on the Free Speech Coalition, Randazza Legal Group and the connections to convicted pedophiles, human trafficking, prostitution rings in the porn industry

It is Cox's moral, legal, constitutional right to warn the public about Porn industry attorneys, thugs, stalkers, pedophiles, crime ring and to speak critical of, review, parody, report on her

former attorney Marc Randazza. Cox has never EVER offered to clean up Randazza' reputation, that would be impossible as many blog and report on Marc Randazza's criminal connection and unethical behavior and his responsible for his own bad reputation.

This court has no legal or constitutional right to give Randazza my intellectual property with no First Amendment adjudication but they did and there is nothing I can do about it.

I don't even understand what Contempt of Court means here. My rights have been violated, my life threatened, I am under constant attack and duress, I have every right to post online as Randazza and his thugs who this court knows and is of record threatens me and my sources constantly. If I do not Post and stay VISIBLE I will disappear as so many who expose mafia connected organized crime in the porn industry do.

The Russian Mafia is connected to those connected to Randazza and Porn. This is a FACT, I know this from porn industry insiders. My life is in daily danger, so is the life of Monica Foster aKa Alexandria Melody AND Desi Foxx aka Diana Grandmason, they both are sources for me and they are investigative bloggers. Diana is a registered human traffic victims. Both stalked and harassed by Randazza Legal Group and their connections.

This is very real life and death stuff. If I do not blog and expose their every move, I Disappear and so do my sources. Monica was threatened last week with her eyes being gouged out and face knifed. Then a knock on her door, then a post online about the knock taunting her.

These men do this to Shelley Lubben, porn whistle blower as well, their goal is to scare, taunt, drive to suicide, bankruptcy and torture those trying to get people out of porn, expose porn, and fight for the condemn ban that Randazza is against.

Defendant Cox cannot stop posting about Randazza, as her life and the life of her sources and the victims of these thugs will be left unprotected. Randazza is a real life mafia, porn, criminal. And this court has allowed him to torture me, threaten me, lie about me and refused to give me a protective order, refused to enjoin the attorney general and left me and my sources to be under massive and constant, Extreme duress and retaliation.

I, Cox, stopped replying to motions as my words are unheard, my cry for help unheard, my facts unseen. My answers dismissed. Why bother filing a response when I am not an attorney and I am massively discriminated against.

I do the best I can to fight back, ya I ramble, I am not an attorney. If this court needs to arrest me, find me in contempt, so be it, nothing I can do but do my best.

My motive has always been to help victims of corruption. I have never asked for money to remove anything ever. I have around a million blog posts. hundreds of facebook pages, thousands of blogs, been at this nearly 10 years, and all to help give voice to victims of

corruption and nothing EVER gained by me, personally, only loss. I lost my home, my life as I knew it, my business and face constant attack and all to try and make the world a better place.

I will not be silenced, my life depends on it and so do the victims I am trying to protect.

I have a Free Speech constitutional right to speak up and a moral obligation to protect others and a spiritual obligation to fight back against Evil to the best of my ability.

The porn industry is doing bad, sick vile things and I have tried to tell this court and I am unheard. Randazza keeps at me to silence me and he NEVER WILL.

If that puts me in Jail I will still file court documents, and or my followers will report the story. I have every right to talk about, expose, report on Marc Randazza and to call his wife names, that is my First Amendment right.

The FBI, DOJ, attorney general NEED to come into every part of this case, Yet when I ask this court to bring them in, I am unheard.

I lost electronic access, had my complaint answer removed, was forced to answer the complaint and leave out my answer to civil conspiracy though Randazza accused me of it. Randazza has clearly abused the court process and is clearly above the law, 16 months and counting. And all this after he was my attorney.

I, Cox cannot defend myself any longer in this case. My health, my life, money, fear, duress.. I cannot do it anymore, I ask the court to appoint counsel, If I am denied then the court will have to obey the law to the best the court can, and if I get a default, I have no way to stop that. I have not the ability to fight anymore.

2.) With all due respect, I don't care if this court strikes my answer to the complaint from 16 months ago, I lost. Randazza ruined my life, the blogs are gone, the damage is done, I don't CARE, I can't undo any of the damage Randazza and this court of done now. So take the answer, don't, either way I lost long ago in this case. I have nothing else to lose.

Strike my answers, let Randazza rule the courts and do what he wants. If this is the Law then so be it obey the law and strike my answer. Clearly I have no legal rights in this case and have not since the beginning. If my punishment for standing up against Randazza is my right to respond is taken, and that is the LAW and the constitution of the U.S., then so be it nothing I can do.

3.) This court can deem Cox has abandoned her defense if that is what this court deems best and of the law. Cox has fought as hard as possible, filed every motion she could, stood up and fought as hard as she can, and nothing was heard.

Cox did not abandon her defense, she fought as hard as she could and begged, asked, demanded counsel be appointed to her and for a protective order, Cox was discriminated against at every level. So at this point I see no need to file a response, I am not heard nor taken serious and really I don't blame ya. I ramble, as I said, but in my DEFENSE I have filed motions asking for an attorney, stated law and pleading best I could for 16 months and now I have no clue what to do next, been there done that, now what?

Cox did NOT fail to keep a valid address, for two months Cox lived in the street. Cox had no money to pay up her PO Box. If the court wants to enter 100,000 default for x amount of domain names, say around \$3 Million, due to me not having \$120 for my PO Box, well then go right ahead, if that's the law then that's the law.

Plaintiff lied of the PO Box still being closed, it was closed from September and October ONLY. Cox has had the box paid up since. Plaintiff constantly lies to this court, commits perjury and is above the law.

If this court deems it based in law to enter a default due to Cox not replying to Randazza, well then go ahead. As I cannot get motions timely, he will NOT email them to me, I get them when I find them online and have no time to respond, no money to print. This motion I borrowed money to print and mail, I cannot do this often and have no electronic access. Randazza refuses to email documents though it would be easier and I could respond.

I have no way to fight back, to reply under this extreme duress by Plaintiff and his co-conspirators.

I have not abandoned my Defense, I have done all I can to defend myself, however and have no idea what is left in this court, as I have exhausted all I know to do to fight back. I am not an attorney and have NO legal training, no money.

This court had no valid legal reason to take Cox's electronic service, Randazza lied, this court took the lies as fact. Cox then had severe hardship and no way to mail responses nor an ability to even know they existed.

Cox will not be deposed by Randazza or anyone connected to him. Cox is in fear of her life. This case has become ridiculous. Randazza already ruined my life, took the blogs what else is there to take? Default? to take what? My Birthday?

So I have one day to send this to the courts, so I am typing this on Feb. 27th, 2014, to mail on Feb. 28th, 2014. And truly am doing the best I can. Not to mention Randazza is attacking me in the Ninth Circuit court of appeals and elsewhere I have to respond to. I am doing the best I can. Once a default is entered, I will do the best I can to appeal to the Ninth in this matter as a pauper. And will do what I can to file criminal complaints and attempt to protect the public at large.



Certification of Service

On February 28th, 2014, Counter Plaintiff Crystal Cox certifies mailing a copy of this counter complaint to:

Attention: **Judge Jennifer A. Dorsey**

Las Vegas Courts

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Crystal 2 4

Crystal Cox

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